

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AIMS INSTITUTE, PLLC, *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:22-CV-02396

**AGREED MOTION TO RESET THE
DEADLINE FOR JOINT STATUS REPORT**

Defendants, Attorney General Merrick Garland, et al., request that the Court reset the parties' deadline for filing a joint status report on the forthcoming 30(b)(6) deposition. As explained below, the parties require more time to complete the Court-authorized 30(b)(6) deposition. Plaintiffs are in agreement with this motion. In further support of this motion, Defendants would show the Court the following:

1. The Court has authorized Plaintiffs to take a 30(b)(6) deposition of Defendants in this case. In addition, the Court ordered the parties to jointly report on the status of the 30(b)(6) deposition by December 15, 2022. Doc. No. 13.

2. The parties scheduled the 30(b)(6) deposition for December 12, 2022. However, due to last minute logistical hurdles and health issues, the parties were unable to go forward with the deposition as scheduled. The parties will reschedule the deposition for a date in the near future (subject to the health issues being resolved) and are currently evaluating proposed dates.

The parties therefore request that the Court reset the deadline for a joint status report from December 15, 2022, to January 6, 2023.

DATED: December 14, 2022

Respectfully Submitted,

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
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Southern District of Texas
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CERTIFICATE OF CONFERENCE

Defendants have conferred with Plaintiffs about this motion and Plaintiffs have no opposition and are in agreement with the requested relief.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on December 14, 2022, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney